



OVER 35 YEARS OF DEDICATED SERVICE

ORIGINAL

ISO 9001 REGISTERED

77 West Broad Street, Unit 21A • Bethlehem, Pennsylvania 18018, USA • (610) 758-9602 • Fax: (610) 758-9615 Email: InquireHere@kesslerchemical.com • Web: www.kesslerchemical.com

June 1, 2012

Kenneth I. Rose, III, Financial Analyst Office of Enforcement, Cost Recovery Branch U.S. Environmental Protection Agency, (Region III) 1650 Arch Street (3HS62) Philadelphia, PA 19103

Enclosure E Response to EPA letter dated March 15, 2012

I have reviewed all existing files to determine if Kessler Chemical, Inc. (KCI) shipped hazardous substances, including those specifically mentioned by name in Enclosure E of your letter to the Metro Container (METRO) site. KCI did not produce such substances and did not have such facilities to do so. We were not able to locate a copy of our April, 1988 response letter, which EPA states we sent and was received by EPA. It is my understanding you were also not able to locate a copy.

With this as background, I provide the following responses to your March 15, 2012 letter:

- 1. I have located documents from 1987-88 (see enclosed) that suggest that approximately 600 KCI empty drums were at the METRO site for reconditioning. No METRO bills of lading, pickup receipts, purchase orders, invoices etc. were found.
- a) KCI owned no such facilities. An address of the facility from which the empty drum shipments might have been made is EZ Chemical Co., Laurel and Canal Streets, Philadelphia, PA. EZ Chemical was a toll packager for KCI of chemicals that were produced elsewhere. EZ Chemical is no longer in business.
- b) No products/materials were produced for KCI at EZ Chemical. Chemicals, produced by independent contractors, were filled by EZ into drums from delivering tank trucks.
- 2. Not applicable. See 1b.
- 3. Not applicable. See 1b.
- 4. None. See 1a and 1b.
- 5. Not applicable



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- 6. Aniline
- 7. None
- 8. No drums would have been sent from any KCI facilities, as we had no such facilities. Any empty drums, formerly-containing Aniline, that were sent to METRO for reconditioning would have had product/hazmat labels, customer labels and EMPTY DRUM labels on them, as well as been green and white in color.
- 9. Only empty drums were shipped to METRO.
- 10. Aniline
- 11. Mr. Barry M. Kessler, President, Kessler Chemical, Inc., 77 West Broad Street, Unit 21A, Bethlehem, PA 18018, 610-758-9602.
- 12. KCI has not located any such documents, and did not have a retention policy during the stated time period.
- 13. KCI has no such information.

Barry M. Kessler



KESSLER CHEMICAL, INC. □ BOX 270, STREET ROAD □ NEW HOPE, PENNSYLVANIA 18938 □ (215) 598-7141

1/13/88

N Ed Takerocki jr. Ez Chemical

> Confirming our recent telephone Conversations, I will sell you my inventory of "raw", DOTITC drums, formerly in andine service. most of these drums (about 70%) are lined with (2) water of Unichrome baked phenolie all these drums, . Which number about 600, are at metro, with the exception of the 65 recently returned to your foulty by Pfirer I am asking 4 per drum on an as is, where is "bases. Jet me know j you're interested. Please find evelosed copies of sections of the DOT Rege relative to the prehaging of allyl alcohol you should note that if you plan to use the DOTITC drums referred Tel above In this product, they should be

reconditioned only by a certified reconditioner.

Regards Barry tessler

NO.870130C

DATE 1/30/87

Aniline

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TO:

EZ Chemical Co. SHI 3230 North Third St. Philadelphia, PA 19140

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PURCHASE ORDER | **DATE REQUIRED** SHIP VIA F.O.B. PAYMENT TERMS 2/3/87 9am (see below) Het 3n QUANTITY AND DESCRIPTION OF MATERIAL PRICE AMOUNT PACKAGING Drum off approximately 100 X 450# net drums of Aniline, \$7.00/Dr. plus Lot# 87020\$ as follows: dunnage charde 80 drums into green & white reconditioned DOT 17C drums -Fill in on drum labels: Code# 00040 Lot# 870203 P.O. # CA 21476 Pel# 3 Also apply a Returnable Aniline Drum label to the head of these drums. Balance of load into new, lined, gray & white DOT 17C drups from our inventory. Take retain samples Apply Cap seals Send paperwork ASAP motio did not deliver 200 dums - 2-2-87 due to a fire SPECIAL INSTRUCTIONS:

Delivering Bulk Carrier: Carbon Express (1-800-341-2302)

Outbound Drum Carrier: 80 drums PRMMI/McCullough (1-800-631-2022)

empty drums: Metro (approx. 200 drums arriving 2/2)

Full drum disposition: \$80 decon drums to be palletized, stretch-wrapped and put into 35 foot PRMMI Container on 2/5. B/L enclosed. Certificate of analysis & MSDS to be taped to drum at rear Brace & Block load.

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BY Barry M. Kessler

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NO. 370217

DATE _2/16/97

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REGOLET CHEMICAL, INC. LI 27031REE1 ROAD, R.D. #2 LI	NEW HOPE PENNSY! VANIA 18938 II S A	CT 215-500 7141

EZ Chemical Co.

ATTN: Ed Makrocki
3230 North Third St.
Philadelphia, PA 19140

EZChemical Co. Laurel & Canal Streets Philadelphia, PA

QB - 32756

DATE REQUIRED	SHIP VIA	F.O.I	3.	PAYMENT T	ERMS
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	Take retain samples				·
	Apply cap seals				<u> </u>
	Send us all paperwork ASAP				
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SPECIAL INSTRUCTIONS:
Delivering carrier: Carbon Express
Full drum disposition: Hold in stock for March shipment to Puerto Rico

BY Barry	Μ.	Kess	ler		
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NO. 370218

DATE 2/13/87

TO:	CAL, INC. LI 270 STHEET ROAD, R.D. =	#2 NEW HOPE,		.18938, U.S	.A. □ 215-59	98-7141
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DATE REQUIRED	SHIP VIA		F.O.B.		PAYMENT TI	ERMS
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BYBangy M. Kessler
My Malssle



NO. <u>8701307</u> DATE <u>1/30/87</u>

KESSLER CHEMICAL, INC. □ 270 STREET ROAD, R.D. # 2, □ NEW HOPE, PENNSYLVANIA, U.S.A. □ 215-598-7141

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